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Attorneys for Defendants THE FIRST
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(acting on behalf of the Defendants
listed below for purposes of this stipulation)

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Attorneys for Plaintiff Lisa Gentilcore

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

LISA GENTILCORE, on behalf of
herself and all others similarly
situated,

Plaintiff,

v.

FIDELITY NATIONAL
FINANCIAL, INC., *et al.*,

Defendants.

CASE NO. CV 08-1374 JSW

Assigned Judge: Hon. Jeffrey S. White

**STIPULATION AND [PROPOSED]
ORDER FURTHER EXTENDING
TIME FOR DEFENDANTS TO
RESPOND TO COMPLAINT**

1 WHEREAS, on March 11, 2008, Plaintiff filed a Complaint seeking recovery
2 under the Sherman Act, Cal. Bus. and Prof. Code §§ 16720, *et seq.*, Cal. Bus. and Prof.
3 Code §§ 17200, *et seq.*, and alleging unjust enrichment;

4 WHEREAS, on April 2, 2008, this Court So Ordered the parties' stipulation
5 extending the time for all Defendants to move against, answer or otherwise respond to
6 the Complaint through and including May 27, 2008;

7 WHEREAS, this action is one of sixty-four (64) actions recently filed in district
8 courts across the country that are the subject of a pending Motion for Transfer of Actions
9 Pursuant to 28 U.S.C. § 1407 for Coordinated or Consolidated Pretrial Proceedings filed
10 with the Judicial Panel on Multidistrict Litigation ("J.P.M.L.") in *In re Title Insurance*
11 *RESPA and Antitrust Litigation* (the "MDL Motion"), and that motion is scheduled for
12 argument before the J.P.M.L. on May 29, 2008; and

13 WHEREAS, Defendants believe that judicial economy and efficiency will be
14 promoted by extending the May 27, 2008 deadline to respond to the Complaint in the
15 above-captioned action pending a determination of the MDL Motion, and therefore, have
16 requested a further extension of time within which to move against, answer or otherwise
17 respond to the Complaint; and

18 WHEREAS, Plaintiff's counsel has agreed to this request;

19 NOW THEREFORE, the undersigned parties through their respective counsel
20 stipulate and respectfully request on behalf of all Defendants that the Court order as
21 follows:

22 The time for all Defendants to move against, answer or otherwise respond to the
23 Complaint in the above-captioned action shall be extended until 30 days following the
24 determination of the pending MDL Motion by the J.P.M.L.

25 Defendants reserve their rights to move for a stay of all proceedings in this action
26 until the Judicial Panel on Multidistrict Litigation determines the pending MDL Motion,
27 or to request further extensions of this deadline, and Plaintiff reserves her rights to
28

1 oppose such motion or request. Nothing in this stipulation shall be construed as a waiver
2 of any party's right to seek or oppose transfer of this action or coordination or
3 consolidation of this action with any other action.

4 This stipulation may be executed in counterparts, including by signature
5 transmitted by facsimile.

6
7 Dated: May 15, 2008

Respectfully Submitted,

GREENBERG TRAURIG, LLP

8
9 By


FRANK B. MERIDETH, JR.

10 Attorneys for Defendants THE FIRST
11 AMERICAN CORPORATION, FIRST
12 AMERICAN TITLE INSURANCE COMPANY,
13 and UNITED GENERAL TITLE INSURANCE
14 COMPANY (acting on behalf of the Defendants
15 listed below for purposes of this stipulation)

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1
2 Dated: May 15, 2008

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10 Attorneys for Plaintiff Lisa Gentilcore

11 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

12
13
14 DATED: _____

HON. JEFFREY S. WHITE